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11 **UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 PEGGY BANKS, individually and on behalf
14 of all others similarly situated,

15 Plaintiff,

16 v.

17 SUNRUN INC.

18 Defendant.

19 Case No. 4:24-cv-07877-JST

20 **DECLARATION OF GLENN T.
21 GRAHAM IN SUPPORT OF
22 STIPULATION AND [PROPOSED]
23 PROTECTIVE ORDER**

24 Hon. Jon S. Tigar

25 CASE NO. 4:24-CV-07877-JST

26

27 DECLARATION OF GLENN T. GRAHAM IN SUPPORT OF STIPULATED PROTECTIVE
28 ORDER

I, Glenn T. Graham, declare as follows:

1. I am an attorney authorized to practice law in the States of New Jersey, New York, and California. I am a partner with the law firm of Kelley Drye & Warren LLP and counsel of record for Defendant Sunrun Inc. in this matter. I make this declaration in support of the Stipulated Protective Order. I have personal knowledge of the facts set forth herein, and if called upon to do so, I could competently testify thereto.

2. The Stipulated Protective Order concurrently filed hereto is nearly identical to the Model Order for the Northern District of California, located at <https://cand.uscourts.gov/forms/model-protective-orders/>, except for the addition of case-identifying information and the addition of language to Section 11, titled “Inadvertent Production of Privileged or Otherwise Protected Material.”

3. Section 11 includes stipulated language regarding the effect of a disclosure of communication or information covered by the attorney-client or work product privilege.

4. A redline comparing the model order for the Northern District of California to the parties' Stipulated Protective Order is attached hereto as **Exhibit A**.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 25th of July, 2025

KELLEY DRYE & WARREN LLP

By: /s/ Glenn T. Graham

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